

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

_____)	
UNITED STATES OF AMERICA,)	
)	
v.)	Nos. 08-CR-10223-PBS
)	08-CR-10262-PBS
ALBERT GONZALEZ,)	
)	
Defendant.)	
_____)	

ASSENTED-TO MOTION TO FILE PORTION OF SENTENCING MEMORANDUM
UNDER SEAL

Now comes the defendant Albert Gonzalez and respectfully moves that this Honorable Court permit him to file a portion of his Sentencing Memorandum under seal.

As reason therefor, defendant states:

1. The matters set forth in the portion of the Sentencing Memorandum which defendant seeks to file under seal are confidential, and their disclosure would be inconsistent with the due administration of justice. Defendant refers the Court to Section II(A) of his Sentencing Memorandum submitted to the Court under seal for the content which he seeks to file under seal, which provides additional explanation for this request.

2. Defendant has prepared a redacted version of his Sentencing Memorandum which excludes the material which he seeks to file under seal which he will file on the public docket through this Court's ECF system, along with the supporting exhibits.

3. The government agrees that the information set forth in Section II(A) of defendant's Sentencing Memorandum should be filed under seal and not disclosed to the public.

Respectfully Submitted,
By His Attorney,

/s/ Martin G. Weinberg
Martin G. Weinberg, Esq.
Martin G. Weinberg, PC
Mass. Bar No. 51948
20 Park Plaza, Suite 1000
Boston, MA 02116
(617) 227-3700
owlmgw@att.net

DATED: December 15, 2009

CERTIFICATE OF SERVICE

I, Martin G. Weinberg, hereby certify that on this 15th day of December, 2009, a copy of the foregoing document has been served via the Electronic Court Filing system on all registered participants, including Stephen P. Heymann, AUSA.

/s/ Martin G. Weinberg
Martin G. Weinberg